



## UNION SCHOOL OF THEOLOGY

### SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

Policy Accepted by Academic Board on: \_\_\_\_\_ 29/4/17

Policy Revised for Open University in July 2018

Policy to be reviewed by Safeguarding Co-ordinator: \_\_\_\_\_ January 2019

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### 1. STATEMENT

This policy has been compiled with regard to the Welsh Government's guidelines Safe From Harm: Safeguarding Children in Voluntary and Community Organisations in Wales (2007); and the Social Services and Well-being (Wales) Act 2014, which refers to people with care and support needs who, as a result of these needs, are unable to protect themselves against abuse or neglect or the risk of abuse or neglect.

This Safeguarding Policy of Union School of Theology is publicly available on the UST website [www.ust.ac.uk](http://www.ust.ac.uk), on the student VLE, and in the library. Students and staff are made aware of the policy at induction events.

The School is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The Prevent Duty Guidance for higher education institutions in England and Wales came into effect on 18 September 2015 following approval by Parliament. If a Safeguarding Concern is believed to be Prevent-related please see the UST Prevent Policy which can be found at [www.ust.ac.uk](http://www.ust.ac.uk) for further information, and report the concern to the UST Prevent Co-ordinator.

### 2. INTRODUCTION

UNION SCHOOL OF THEOLOGY is committed to safeguarding children and vulnerable adults to comply with the law and demonstrate good practice.

The policy reflects the statutory responsibility of Union School of Theology in the area of Safeguarding, and covers all of its staff (paid or voluntary), its students, and all of its activities in all of its locations at all times, and it reflects its policy in relation to others who use the UST buildings.

UNION SCHOOL OF THEOLOGY takes seriously the Christian responsibility to welcome and protect children and vulnerable people (Luke 9:48 & Matthew 18:6-10; Proverbs 31:8-9).

### 3. UNION SCHOOL OF THEOLOGY DETAILS

Name: UNION SCHOOL OF THEOLOGY.

Registered Address: Bryntirion House, Bridgend, CF31 4DX.

Registered Charity Number: 517324.

Contact telephone number: 01656 645411

Email address: [info@ust.ac.uk](mailto:info@ust.ac.uk)

Insurance company:

Ansvar Insurance  
Ansvar House  
St. Leonard's Road  
Eastbourne  
BN21 3UR.  
Contact:  
Adrian Bonas  
Wood Insurance Services  
Morgan House  
248 Cowbridge Road East  
Cardiff, CF5 1GZ.

Policy number: CCP6093612.

Safeguarding Co-ordinator: Sheila Stephen, Welfare Officer:

Contact details: telephone - 01656 766011; email [sstephen@ust.ac.uk](mailto:sstephen@ust.ac.uk) ; availability 9am-10pm, Monday to Friday

Deputy Safeguarding Co-ordinator: Paul Thompson, Resources Manager, Contact telephone number - 01656 645411; email – [pthompson@ust.ac.uk](mailto:pthompson@ust.ac.uk); office hours 9am-4pm, Monday to Friday.

### 4. DEFINITIONS

A child is any person under the age of eighteen.

A vulnerable adult is a person who is 18 years of age or over, and who is, or may be, in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation.

The main categories of people covered by this definition of vulnerable adult include people:

- who have a learning disability
- who have physical or sensory impairments
- who have a mental illness including dementia
- who are old and frail
- detained in custody or under a probation order
- who are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).

## 5. OUR COMMITMENT

The leadership of UNION SCHOOL OF THEOLOGY recognises the need to provide a safe and caring environment for children, young people and vulnerable adults. We acknowledge that children, young people and vulnerable adults can be the victims of physical, sexual and emotional abuse and neglect.

UST is committed to providing a clear and accessible safeguarding structure for its students, staff, and volunteers, or who have concerns about others. It also provides regular Safeguarding awareness training to all its staff and students. All UST students or staff or volunteers should immediately contact the UST Safeguarding Co-ordinator or their Deputy if they have any concerns about themselves or other students, staff or volunteers.

UNION SCHOOL OF THEOLOGY has adopted the procedures set out in this safeguarding policy in accordance with statutory guidance. We are committed to build constructive links with statutory and voluntary agencies involved in safeguarding children and vulnerable adults.

UST undertakes to:

1. Ensure that its Safeguarding officers will receive regular training and support for this aspect of their work.
2. Train paid all staff and volunteers in child protection and safeguarding. This is undertaken during semester time for on-campus staff, and during the annual Union Conference for Lead Mentors. These sessions are mandatory and will be recorded so that they can be accessed by those unavoidably not able to be present, or those who take up their role after the Conference. The Provost will ensure that this training normally takes place once per year.

3. Ensure that all staff, volunteers and students, are checked through the DBS process if this is necessary as part of their work, and according to the most up-to-date guidance. Enhanced Disclosures will be necessary for any UST staff member, volunteer, or student who in the course of her/his work or study at UST, and on behalf of UST, is involved in a substantial degree of contact with children or vulnerable adults (supervised or unsupervised). A Basic Disclosure will be required if any staff member, student or volunteer for any other activities with vulnerable people as part of their work or studies at UST. At all times UST will seek to follow guidance from the Churches Child Protection Advisory Service – now called thirtyone:eight) and will seek advice from that organisation when necessary
4. Apply procedures for protecting children and vulnerable adults to all staff and volunteers who are working with children and vulnerable adults on behalf of UNION SCHOOL OF THEOLOGY.
5. Give all staff and volunteers, who work with children or vulnerable adults, clear roles and job descriptions.
6. Provide Safeguarding care and support to its all its students
7. Plan any activities where children and vulnerable adults are involved in such a way as to minimise situations where the abuse of children or vulnerable adults may occur.
8. Ensure that protecting children and vulnerable adults is a key aspect of any work with them.
9. Issue guidelines on how to deal with the disclosure or discovery of abuse.
10. Operate a system whereby anybody affected by, or concerned about Safeguarding issues, may talk with the Safeguarding Co-ordinator or the Deputy Safeguarding Co-ordinator at any time.
11. Ensure any staff, volunteers or students who are undertaking activities with children, in the course of their work for UNION SCHOOL OF THEOLOGY will recognise that they are caring for children of vulnerable people in the absence of parents or carers, and will follow correct procedures and ensure that parents of children are provided with accurate information about activities and that parental consent is obtained for all activities.
12. Ensure that premises used meet the requirements relevant legislation, including that of the Equality Act 2010.
13. Ensure that a procedure is set up, with guidance from the Churches Child Protection Advisory Service, if a known offender attends UNION SCHOOL OF THEOLOGY meetings.
14. Ensure that any church or organisation that uses the premises for work with children or vulnerable adults has a safeguarding policy in place.

## 6. SCOPE OF POLICY

This policy covers occasions when children, young people and vulnerable adults are on the premises or are involved in activities organised by UNION SCHOOL OF THEOLOGY staff members, volunteers, or students, in association with UNION SCHOOL OF THEOLOGY at other locations.

The policy also covers occasions when Churches and other organisations use UNION SCHOOL OF THEOLOGY premises for activities that involve children or vulnerable adults. External organisations must demonstrate to the satisfaction of UST that they have their own safeguarding policies and procedures. Information about this will be sought as part of the premises bookings procedure. These policies procedures must be supplied to the UST Safeguarding Officer or Deputy who will check them against the current legislative requirements and guidance. If the UST Safeguarding Officer or Deputy are not satisfied that they meet the current legislative requirements and guidance, permission to use the buildings will not be granted. Churches and other organisations which use Union School of Theology premises for activities that involve children or vulnerable adults must also indicate in writing that they will comply with the Union School of Theology Safeguarding Policy.

Students on ministry placements as part of their studies are expected to comply fully with the safeguarding procedures of their placement church or organisation, including having DBS checks. Enhanced Disclosures will be necessary for any who will be involved in a substantial degree of contact with children or vulnerable adults (supervised or unsupervised). A Basic Disclosure will be required if the role involves other activities with vulnerable people or children (such as regularly offering transport) as part of their studies at UST.

The Lead Mentor of each UST Learning Communities should signify in writing agreement with the Union School of Theology Safeguarding Policy as part of their agreement to comply with all UST policies and procedures. Lead Mentors should follow that policy in relation to safeguarding matters if the issue relates to a UST student and follow the reporting procedure set out in 9.2 in this policy. If the issue does not relate to a UST Staff Member / Lead Mentor / Student, the equivalent Safeguarding reporting policy of the location where the Learning Community meets should be followed.

7. APPOINTMENT OF RELEVANT STAFF AND VOLUNTEERS (PAID AND VOLUNTARY) WHO WORK WITH CHILDREN AND VULNERABLE ADULTS IN THE COURSE OF THEIR WORK FOR UNION SCHOOL OF THEOLOGY

For all staff, volunteers and students deemed by the Safeguarding coordinator to have regular and/or intensive contact with children and vulnerable adults, as part of their work for UNION SCHOOL OF THEOLOGY, the School's leadership will ensure that:

- All prospective leaders and helpers sign a declaration stating that there is no reason that does or might prevent them from working with children or vulnerable adults.
- All leaders and helpers are subject to the principles of best recruitment as laid down by UNION SCHOOL OF THEOLOGY.
- Any forms or documents required are filled in and signed, and ensure that the names of two referees are provided who will be contacted to give details of any previous involvement with children or vulnerable people.
- Information on full employment history is obtained for anyone employed by UNION SCHOOL OF THEOLOGY.
- A formal interview is held for any staff, volunteers or students intending to work with children or vulnerable adults.
- All appointments for such work are for a probationary period during which they will receive supervision from the Safeguarding Officer or their Deputy.
- Clear information is given about roles (including job descriptions), safeguarding, training and the supervision of children.
- DBS checks at the appropriate level (see 5.3 above) are obtained.

8. DEFINITIONS OF ABUSE

8.1 Types of abuse: Children

There are four types of child abuse. These are defined in UK Government guidance *Working Together to Safeguard Children 2010* (1.33-1.36) as follows: physical abuse; emotional abuse; sexual abuse; neglect.

| Definition     | Description  | Possible Signs   | Changes in Behaviour which may be an indicator         |
|----------------|--|--|--|
| Physical abuse | May involve hitting, shaking, throwing, poisoning, burning or scalding, suffocating or | Unexplained bruising, marks or injuries on any part of the body. | Fear of parents/carers being asked for an explanation. |

| Definition      | Description  | Possible Signs   | Changes in Behaviour which may be an indicator   |
|-----------------|--|--|--|
|                 | <p>otherwise causing physical harm.<br/>Also when a parent or carer fabricates symptoms of an illness or deliberately induces an illness in a child.</p>   | <p>Multiple bruises – in clusters, often on the upper arm and outside of the thigh. Cigarette burns; human bite marks; broken bones; scalds with upward splash marks; multiple burns with a clearly demarcated edge.</p> | <p>Aggressive behaviour; severe temper outbursts; flinching when approached or touched; reluctance to get changed (in hot weather); withdrawn behaviour or depression; running away from home.</p>   |
| Emotional abuse | <p>The persistent mistreatment of a child, causing severe and persistent adverse effects on the child's emotional development. This may involve conveying to a child that they are unloved, unwanted or not valued. It may include silencing a child, not allowing them to express their views or making fun of what they say or how they say it. It may involve expecting too much of a child, overprotection or preventing a child joining in activities for their age group. It may involve bullying,</p> | <p>There may be a developmental delay or failure to grow or thrive.</p>  | <p>Behaviour such as sulking; hair twisting or rocking; being unable to play; fear of making mistakes; sudden speech problems; self-harm; fear of parent/carer being asked about their behaviour; developmental delay of emotional progress.</p> |

| Definition   | Description  | Possible Signs  | Changes in Behaviour which may be an indicator   |
|--------------|--|---|--|
|              | cyberbullying, exploiting children or causing them to feel frightened or in danger.  |   |  |
| Sexual abuse | Forcing a child or young person to take part in sexual activities; unwanted physical contact; penetration or non-penetrative acts. It may involve children viewing or producing sexual images, grooming a child for sexual purposes and encouraging a child to act in sexually inappropriate ways. | Pain, itching, bleeding or bruising in the genital area; Sexually transmitted diseases; vaginal discharge or infection; stomach pains; discomfort when walking or sitting; pregnancy. | Sudden, unexplained changes in behaviour such as becoming aggressive or withdrawn; fear of being left with a specific person or group; nightmares; running away; sexual knowledge beyond their age or developmental level; sexual language or drawing; bedwetting; eating disorders; self-harm, mutilation or suicide attempts; saying they have secrets they can't tell; drug or substance abuse; unexplained sources of money; not |

| Definition | Description   | Possible Signs  | Changes in Behaviour which may be an indicator   |
|------------|---|---|--|
|            |   |   | allowed to have friends; acting in a sexually explicit way towards adults.   |
| Neglect    | Failing to meet a child's basic physical and/or psychological needs which results in a serious impairment of the child's health or development. Failing to provide adequate food, clothing or shelter; failing to protect a child from physical and emotional danger or harm; failure to ensure adequate supervision of children; failure to ensure access to medical care or treatment. Failing to respond to a child's basic emotional needs. Maternal substance abuse. | Constant hunger; stealing food; constantly dirty or smelly; loss of weight; underweight; inappropriate clothing for the weather conditions. | Complaining of being tired all the time; not requesting medical help; failing to keep medical appointments; having few friends; mentioning being left alone or unsupervised. |

## 8.2 Types of abuse: Vulnerable Adults

Physical abuse: This includes hitting, pushing, scalding, hair pulling, shaking, pinching, kicking, misuse of medicines, restraint, or inappropriate sanctions.

Sexual abuse: This includes rape and sexual assault, sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting.

Emotional abuse: This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, bullying, blaming, controlling, intimidation,

coercion, harassment, verbal abuse, isolation or being prevented/ withdrawn from receiving services or supportive networks.

Financial or material abuse: This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect and Acts of Omission: This includes not meeting appropriate medical or physical care needs, or withholding the necessities of life such as food, heating and medicines which causes the person to suffer.

Discriminatory Abuse: This includes any abuse or harassment because of a person's race, gender, sexuality, disability or age.

Institutional Abuse: This includes abuse as result of persistently poor care or a rigid and oppressive regime in a care setting.

An act of abuse normally falls under more than one type of abuse.

## 9. RESPONDING TO DISCLOSURE

9.1. a In the event of a member of staff, a volunteer, or a student, having a concern of abuse or neglect or being told of alleged abuse of a child or vulnerable person they should:

- Remain calm.
- Explain the limits of confidentiality (they must explain that it may be necessary to pass on information to another member of staff on a "need to know basis" who may have to inform someone outside of UNION SCHOOL OF THEOLOGY).
- Encourage the child or adult to talk but without prompting, asking leading questions or making suggestions.
- In response, remain neutral and simply reflect back what has been said.
- Explain what action might follow, and who will need to know.
- Never speak to parents or carers.
- Never inform or confront the alleged abuser.
- Write down, as soon as possible afterwards, verbatim, exactly what was said and observed, noting date, place and time disclosure was made and a note of anyone else who was present. The written report should be signed and dated and given to the event or activity leader, whose responsibility it will be to inform the Safeguarding Co-ordinator or their Deputy to whom the written report will be given.
- If there are any concerns about a child or adult returning to a home or place where alleged abuse may have taken place then the Safeguarding Co-

ordinator should be contacted immediately and should seek guidance from the appropriate agencies. If the Safeguarding Co-ordinator cannot be contacted then Social Services should be contacted.

#### 9.1.b Disclosure on Student Placements

Any disclosure of abuse of a child or vulnerable person that occurs within a student placement setting should be first reported to the safeguarding lead at the placement but then also reported Safeguarding Co-ordinator at Union School of Theology, in accordance with the safeguarding procedures for UST.

#### 9.2 If made aware of a disclosure of abuse, the Safeguarding Co-ordinator should:

- Inform a senior member of staff (Provost or Executive Director) immediately.
- If they cannot be contacted then the Co-ordinator should proceed straightaway to seek guidance from the CCPAS helpline on: 0845 120 4550 and make a note of guidance given.
- Unless the advice from the CCPAS suggests a different approach, the Safeguarding Co-ordinator should inform the Social Services or Social Services Emergency Duty Team, or the Police if necessary. (See contact list).
- A telephone referral should be followed up in writing within 48 hours.
- When the referral has been made, make a written note of actions taken and advice given, signed and dated.
- Keep all records locked in a secure and confidential place.
- Arrange to meet with the relevant member of UNION SCHOOL OF THEOLOGY senior management team (Provost or Executive Director) to report actions and receive support.
- The member of the senior management team should contact UNION SCHOOL OF THEOLOGY's insurers as soon as possible.
- Ensure confidentiality, in accordance with agreed procedure.

### 10. CONTACT DETAILS: CHILDREN

Bridgend Social Services Safeguarding and Family Support: 01656 642320.

Bridgend Social Services Emergency Duty Team: 01443 849944.

South Wales Police Switchboard: 01656 655555.

Police non-emergency: 101.

Police emergency: 999.

### 11. CONTACT DETAILS: VULNERABLE ADULTS

Adult Safeguarding Team: 01656 642477

Bridgend Social Services Out of Hours Emergency Service: 01443 849944.

South Wales Police Switchboard: 01656 655555.

Police non-emergency: 101.

Police emergency: 999.

## 12. OTHER CONTACT DETAILS

CCPAS helpline: 0845 120 4550.

Childline: 0800 1111.

NSPCC: 0808 800 5000.

Action on Elder Abuse: 0808 808 8141.

The Child Exploitation and Online Protection Centre (CEOP): 0870 000 3344.

UK Safer Internet Centre: 0844 381 4772.

## 13. GENERAL GUIDELINES AND PROCEDURES

All staff, students, or volunteers who are working with children or vulnerable adults as part of their work at UNION SCHOOL OF THEOLOGY should:

- Have a DBS check at the appropriate level for the nature of their work and will be recruited in accordance with agreed UNION SCHOOL OF THEOLOGY procedures.
- Endeavour to create a healthy, friendly, safe and inclusive environment.
- Regard every child and vulnerable adult with respect.
- Ensure that the relevant permission forms are used.
- Never use physical restraint or contact as a means of discipline. If physical restraint is necessary in order to prevent a child or adult from harming themselves or someone else then if possible they should call for help from someone else. After the event the leader of helper should make a written note of the incident, (using the Incident Form) date and sign it and give it to the Safeguarding Co-ordinator as soon as possible.
- Avoid physical contact, unless in the interests of the safety of the child or vulnerable adult.
- Avoid situations that could be compromising or could lead to misunderstanding (for example being alone in a room with a child).

- Ensure that no organised activity takes place involving children or vulnerable adults unless two or more leaders or helpers are in attendance. The expected adult to child ratio should follow the current NSPCC guidance figures.<sup>1</sup>
- Ensure that children are not left alone without an adult present, except in an emergency when the adult is dealing with an emergency.
- Ensure that no child is taken off the premises where the activity takes place without written permission of the parent/carer except under the care of ambulance staff if a parent cannot be contacted.
- Ensure that no child should be given a lift in a leader's vehicle without parental permission. If written permission cannot be obtained, then the leader should contact the parent/carer by telephone.
- Monitor each other's behaviour and practice.

#### 14. ONLINE SAFETY

UNION SCHOOL OF THEOLOGY's policy for internet usage [www.ust.ac.uk](http://www.ust.ac.uk) will be followed for all activities.

No photograph or picture of a child will be used on UNION SCHOOL OF THEOLOGY's website or facebook page without written parental permission.

#### 15. TRANSPORT

If staff, students or volunteers provide transport to events or activities involving children or vulnerable adults, and not as a private arrangement, they should ensure that:

- Their insurance policy covers this.
- Written permission has been secured for transporting the children using the agreed form.

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- <sup>1</sup> <https://www.nspcc.org.uk/preventing-abuse/safeguarding/recommended-adult-child-ratios-working-with-children-guidance>. In 2018 this guidance indicated that at least 2 adults should be present with any group of children, and alongside this the following ratios-
  - 0 - 2 years - 1 adult to 3 children
  - 2 - 3 years  
1 adult to 4 children
  - 4 - 8 years  
1 adult to 6 children
  - 9 - 12 years  
1 adult to 8 children
  - 13 - 18 years  
1 adult to 10 children

- Other than in exceptional circumstances drivers should not transport one child alone.
- Seat belts are worn at all times.
- Booster seats are used for children aged under twelve years of age or 135cm.

## 16. HEALTH AND SAFETY

Risk Assessment forms should be completed and signed off by the Executive Director and the Safeguarding Co-ordinator prior to any new activity or event on the UST premises.

When appropriate UNION SCHOOL OF THEOLOGY insurers will be contacted to make sure that proposed activities (e.g. camps; outings) are covered by UNION SCHOOL OF THEOLOGY's indemnity insurance policy.

There should be an Accident Book with each First Aid Kit – these should be used to record any accident that requires first aid attention.

It is the responsibility of the event leader to ensure that a First Aid Kit and Accident Book are available for every event.

For other incidents, an Incident Form will be used. It should be dated and signed and given to the event leader who should ensure that it is given to either the Resources Manager or Safeguarding Co-ordinator.

Event leaders should familiarize themselves with the location of fire extinguishers, fire alarms, exits and assembly points in any building used for activities.

Registers should be taken out of the building and a roll call made after evacuation.

Incident Forms should be used for any children's and youth activities to record any concern or incident (not directly related to safeguarding), for example an argument or a fight. Incident Forms should be inspected on a monthly basis by the Resources Manager and Safeguarding Co-ordinator and should be stored in a confidential place.

## 17. FOOD HYGIENE

Leaders and helpers of activities held on the UST premises should abide by the Union School of Theology Campus Food Hygiene Policy and practices, a copy of which is kept in the kitchen.

## 18. DATA PROTECTION

Any paperwork relating to safeguarding incidents or concerns will be handled in accordance with UNION SCHOOL OF THEOLOGY's Data Protection Policy which can be found on [www.ust.ac.uk](http://www.ust.ac.uk)

## 19. PHOTOGRAPHY

Permission must be sought from parents or carers before photographs are taken of children at UNION SCHOOL OF THEOLOGY's events.

## 20. RESIDENTIAL EVENTS

For residential events organised explicitly by the UNION SCHOOL OF THEOLOGY involving children or vulnerable adults:

Risk assessments must be completed for each proposed activity.

UNION SCHOOL OF THEOLOGY's insurers must be contacted to ensure that all proposed activities will be covered in the policy.

A leaflet setting out all activities to be undertaken must be issued to parents/carers so that informed consent is obtained.

Permission/Consent forms/Transport forms/Swimming forms and medical forms must be filled in and signed by parents/guardians prior to the event, where relevant.

The Safeguarding Co-ordinator or Deputy (at the UST campus in Bridgend) or designated Home Contact must be given a list of all people running and attending the event and emergency parent contact details prior to the event. If an emergency arises then the event organiser will make contact and use this person to contact relatives, leaving the event organiser free to deal with the emergency or incident.

The event organiser should ensure that a fully charged mobile phone is taken on any activity and is switched on throughout.

Normally leaders or helpers will not sleep in tents, caravans or rooms with children. However, if sleeping accommodation has to be shared then there must always be more than one adult to a room/tent etc.

If children are allowed to leave the event unsupervised this must only take place if written permission has been given and if children are in groups of three or more. A set time must be arranged for children to return and they should be checked in.

First Aid Kit and Accident Book should be taken to the event.

## 21. UNION SCHOOL OF THEOLOGY LEARNING COMMUNITIES

All UST Learning Communities must be made aware of the UST policies and procedures which are found on the School's website [www.ust.ac.uk](http://www.ust.ac.uk) which contains this policy.

All UST Learning Communities are responsible for making their own local arrangements in the area of Safeguarding, or following those of the church or

organization in whose premises they meet, and abiding by the law and good practice for the country or locality where they meet.

Lead Mentors of UST Learning Communities must signify in the Learning Community MOU their agreement on behalf of their Learning Community with all UST policies and procedures, and this includes the Safeguarding Policy. Lead Mentors or students in Learning Communities should follow the Union School of Theology Safeguarding policy in relation to safeguarding matters if the issue relates to a UST student, following the reporting procedures set out in 9.1 and 9.2 in this policy. If the issue does not relate to a UST Staff Member / Lead Mentor / Student, or UST activity, the equivalent Safeguarding reporting policy of the location where the Learning Community meets should be followed.